

Exhibit A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NASSAU

KAREN SKOLNICK and MARK SKOLNICK

Index No.

Plaintiffs

Plaintiffs designate Nassau County
as the place of trial.

-against-

SUMMONS

DICK'S SPORTING GOODS, INC.,

Defendant

The basis of venue is:
Plaintiff's residence
Plaintiffs reside at:
33 Doral Drive
Manhasset, NY 11030
County of Nassau

You are hereby summoned to answer the complaint in this action, and to serve a copy of your answer or, if the complaint is not served with this summons, to serve a notice of appearance on the plaintiff's attorney(s) within twenty days after the service of this summons exclusive of the day of service where service is made by delivery upon you personally within the state, or within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Garden City, New York
February 22, 2022SULLIVAN PAPAIN BLOCK
McGRATH COFFINAS & CANNAVO PC.By: 

John F. Nash

Attorneys for Plaintiffs
Office and P.O. Address
1140 Franklin Avenue, Suite 200
Garden City, NY 11530
516-742-0707

Defendants addresses : DICK'S SPORTING GOODS, INC., c/o Corporation Service Company, 80 State Street, Albany, NY 12207

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NASSAU

KAREN SKOLNICK and MARK SKOLNICK

Plaintiffs

Index No:

-against-

VERIFIED COMPLAINT

DICK'S SPORTING GOODS, INC.,

Defendants

Plaintiffs, by their attorneys, SULLIVAN PAPAIN BLOCK McGRATH COFFINAS & CANNAVO
P.C. complaining of the defendant, DICK'S SPORTING GOODS, INC., (hereinafter "DICK'S"), as
and for their Verified Complaint set forth the following upon information and belief, and at all
times hereinafter mentioned:

FIRST CAUSE OF ACTION

1. On January 22, 2022, plaintiff, KAREN SKOLNICK, resided at 33 Doral Drive,
Manhasset, NY 11030.
2. On January 22, 2022, plaintiff, MARK SKOLNICK, resided at 33 Doral Drive,
Manhasset, NY 11030.
3. On January 22, 2022, plaintiffs, KAREN and MARK SKOLNICK lived together as
husband and wife at 33 Doral Drive, Manhasset, NY 11030.
4. On January 22, 2022, defendant, DICK'S was a foreign business corporation
conducting business in the State of New York.

5. On January 22, 2022, defendant, DICK'S had a New York State Department of State service of process address of c/o Corporation Service, Company, 80 State Street, Albany, NY 12207.

6. On January 22, 2022, defendant, DICK'S was a foreign business corporation conducting business in the State of New York pursuant to the authority to do so authorized by Business Law Corporation Law Section 1304.

7. On January 22, 2022, defendant, DICK'S conducted business in a store located in the Roosevelt Field Mall, Garden City, NY 11530.

8. On January 22, 2022, defendant, DICK'S store in the Roosevelt Field Mall, Garden City, New York sold various sporting goods products, clothing and exercise equipment.

9. On January 22, 2022, defendant, DICK'S owned the aforementioned store located in the Roosevelt Field Mall, Garden City, NY 11530.

10. On January 22, 2022, defendant, DICK'S operated the aforementioned store located in the Roosevelt Field Mall, Garden City, NY 11530.

11. On January 22, 2022, defendant, DICK'S maintained the aforementioned store located in the Roosevelt Field Mall, Garden City, NY 11530.

12. On January 22, 2022, defendant, DICK'S controlled the aforementioned store located in the Roosevelt Field Mall, Garden City, NY 11530.

13. On January 22, 2022, defendant, DICK'S leased the aforementioned store located in the Roosevelt Field Mall, Garden City, NY 11530.

14. On January 22, 2022, the general public was permitted to enter the DICK's store in the Roosevelt Field Mall, Garden City, New York to shop and inspect various products being sold to consumers thereat.

15. On January 22, 2022, plaintiff, KAREN SKOLNICK, was lawfully upon the premises of DICK's in the Roosevelt Field Mall, Garden City, New York.

16. On January 22, 2022, plaintiff, MARK SKOLNICK, was lawfully upon the premises of DICK's in the Roosevelt Field Mall, Garden City, New York.

17. On January 22, 2022, plaintiff, KAREN SKOLNICK, was shown a certain treadmill by an employee of defendant, DICKS's store in the Roosevelt Field Mall, Garden City, New York.

18. On January 22, 2022, defendant, DICK'S put the aforementioned treadmill into operation while plaintiff, KAREN SKOLNICK was on the treadmill.

19. On January 22, 2022, defendant, DICK'S was negligent, careless and reckless in showing, presenting and putting into operation the aforementioned treadmill while plaintiff, KAREN SKOLNICK was on the treadmill.

20. On January 22, 2022, defendant, DICK'S was negligent, careless and reckless in demonstrating the aforementioned treadmill to plaintiff, KAREN SKOLNICK.

21. On January 22, 2022, defendant, DICK'S was negligent, careless and reckless in instructing plaintiff, KAREN SKOLNICK in the use of said treadmill.

22. By reason of the foregoing carelessness, reckless and negligence by defendant, DICK'S, through its agents, servants and/or employees on January 22, 2022, plaintiff, KAREN SKOLNICK was injured.

23. By reason of the foregoing carelessness, reckless and negligence by defendant, DICK'S through its agents, servants and/or employees on January 22, 2022, plaintiff, KAREN SKOLNICK was seriously injured.

24. The limitations of liability set forth in Section 1601 of the CPLR do not apply to the case at bar.

25. By reason of the foregoing, plaintiff, KAREN SKOLNICK, was damaged in a sum of money that exceeds the minimal jurisdiction of all lower courts subordinate to the Supreme Court of the State of New York.

26. By reason of the foregoing, plaintiff, KAREN SKOLNICK, demands Judgment against defendant, DICK'S in a sum of money which fairly and accurately compensates her for her injuries, pain and sequelae that she suffered, said sum exceeding the jurisdictional limits of all lower courts subordinate to the Supreme Court of the State of New York, together with exemplary/punitive damages against defendant, DICK'S.

AS AND FOR A SECOND CAUSE OF ACTION

27. Plaintiffs repeat and reiterate each and every allegation contained in paragraphs "1" through "26" as if more fully set forth herein at length.

28. On January 22, 2022, plaintiff, MARK SKOLNICK, was the lawfully wedded husband of plaintiff, KAREN SKOLNICK, and, as such, lived and cohabited with her at their residence at 33 Doral Drive, Manhasset, New York.

29. As a result of the injuries sustained by plaintiff, KAREN SKOLNICK, on January 22, 2022, through the negligence, carelessness and recklessness of defendant, DICK's, by their

agents, servants and/or employees, plaintiff, MARK SKOLNICK, lost the services, society, love and guidance of his wife, and has become responsible for her care, recovery and cure of his wife's personal injuries.

30. By reason of the foregoing, plaintiff, MARK SKOLNICK, has become responsible for the medical bills associated with the cure and treatment of his wife, KAREN SKOLNICK arising from the injuries she suffered on January 22, 2022, due to the negligence, carelessness and recklessness of defendant, DICK's.

31. By reason of the foregoing, plaintiff, MARK SKOLNICK, has been pecuniarily damaged.

32. The limitations of liability set forth in Section 1601 of the CPLR do not apply to the case at bar.


33. By reason of the foregoing, plaintiff, MARK SKOLNICK, was damaged in a sum of money that exceeds the minimal jurisdiction of all lower courts subordinate to the Supreme Court of the State of New York.

WHEREFORE, plaintiffs, KAREN SKOLNICK and MARK SKOLNICK, demand Judgment against defendant, DICK'S in a sum of money which exceeds the jurisdictional limits of all lower courts subordinate to the Supreme Court of the State of New York, together with exemplary/punitive damages against defendant, DICK'S, altogether with the costs, interest and disbursements of this action from the 22nd day of January, 2022.

Dated: Garden City, New York
February 22, 2022

Yours, etc.,

SULLIVAN PAPAIN BLOCK McGRATH
COFFINAS & CANNAVO P.C.

By: 
John F. Nash

Attorneys for Claimants

1140 Franklin Avenue

Suite 200

Garden City, NY 11530

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inash@triallaw1.com

STATE OF NEW YORK)

)SS.:

COUNTY OF NASSAU)

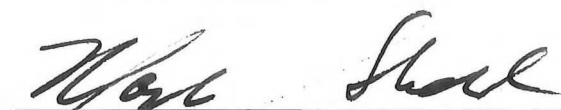
KAREN SKOLNICK and MARK SKOLNICK being duly sworn deposes and says:

We are the plaintiffs in the within action.

We have read the foregoing Complaint and know the contents thereof and the same is true to our knowledge, except those matters therein which are stated to be alleged upon information and belief, and as to those matters, we believe them to be true.

Sworn to before me this
24th day of February 2022


KAREN SKOLNICK


MARK SKOLNICK

JOHN F. NASH
Notary Public, State of New York
No. 02NA5010953
Qualified in Nassau County
Commission Expires 4/12/2023

09.15.2023